

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|  |   |                               |
|--|---|-------------------------------|
| <b>BURGESS ROE AND JANE J.<br/>ROE,</b>                            | : | No. _____                     |
|  | : |                               |
|  | : | <b>[Filed Electronically]</b> |
| <b>Plaintiffs,</b>   | : |                               |
|  | : |                               |
| <b>vs.</b>   | : |                               |
|  | : |                               |
| <b>CHIEF EXPLORATION &amp;<br/>DEVELOPMENT LLC, <i>et al.</i>,</b> | : |                               |
|  | : |                               |
| <b>Defendants.</b>   | : |                               |

**NOTICE OF REMOVAL**

Defendants Chief Exploration & Development LLC; Enerplus Resources (USA) Corporation; Reach Petroleum, LLC; Edward E. Robbs; Source Oil & Gas, LLC; Schnerk Revocable Trust, Robert Quillin, Seaspin Pty Ltd as Trustee For Aphrodite Trust, eCorp Resource Partner I, LP; Craig Ian Burton, as Trustee of the CI Burton Family Trust, Denpeer Energy, L.P., Rock Creek Ranch I, Ltd, Radler 2000 Limited Partnership; Texas E. Partners, X, LP; MKR Holdings, LLC; Giana Resource, LLC (collectively, the “Removing Defendants”) hereby serve notice that they are removing this action from the Court of Common Pleas of Sullivan County, Pennsylvania, to the United States District Court for the Middle District of Pennsylvania.

1. Plaintiffs Burgess and Jane Roe filed a complaint in the Court of Common Pleas of Sullivan County, Pennsylvania, on April 5, 2011. A copy of the complaint is attached at Tab “A.”

2. The complaint names the Removing Defendants and The Keeton Group, LLC, as defendants.

3. Plaintiffs are citizens of Pennsylvania.
4. All of the defendants are citizens only of states or commonwealths other than Pennsylvania.
5. Plaintiffs seek an order to quiet title by declaring that an oil-and-gas lease has expired.
6. Plaintiffs seek damages for trespass.
7. Plaintiffs seek damages for alleged loss of lease income.
8. The relief sought by Plaintiffs has a value exceeding the sum or substance of \$75,000.00.
9. Plaintiffs could originally have filed their suit in this Court. *See* 28 U.S.C. § 1332.
10. This case is accordingly removable to this Court. *See* 28 U.S.C. § 1441.

April 28, 2011

Respectfully submitted,

**K&L GATES LLP**

s/ George A. Bibikos  
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*Counsel for Removing Defendants*

**CERTIFICATE OF SERVICE**

I certify that, on April 28, 2011, I served a copy of the attached document on the following by U.S. Mail, postage prepaid:

John A. Shoemaker, Esq.  
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/s George A. Bibikos  
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